

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

CAMRON SNEED,	§
	§
	§
	§
	§
v.	§ C.A. NO.: 1:19-cv-608
	§ Jury Trial
AUSTIN INDEPENDENT	§
SCHOOL DISTRICT,	§
	§
	§
<i>Defendant.</i>	§

PLAINTIFF'S EXPECTED TRIAL EXHIBIT LIST

Plaintiff, Camron Sneed, submits the following list of trial exhibits. Plaintiff reserves the right to amend or supplement this list, or withdraw any exhibit listed.

EX. NO.	DESCRIPTION	O F F E R E D	O B J E C T	A D M I T
	I. <u>PLAINTIFF'S EXPECTED EXHIBIT LIST</u>			
P-1	Dec. 16, 2016 FFA Meeting with Ms. Leos and Mr. Trevino (Def. MSJ. Ex. 16);			
P-2	Dec. 12, 2017 Service Tracking Record for William Gamblin (Def. MSJ Exh. 22);			
P-3	Dec. 2017, Emails (McGraw/Robinson) Regarding "Racial Slurs" (Def. MSJ Exh. 23);			
P-4	2017/2018 Bowie HS Barn Rules, Ms. Fisher and Dickinson			

EX. NO.	DESCRIPTION	O F F R E D	O B J E C T	A D M I T
	(Def. MSJ Exh. 24);			
P-5	May 9, 2018 Letter To FFA Parents from D. Shapiro (Def. MSJ Exh. 25);			
P-6	April 10, 2018 FFA Alumni Board Meeting (Def. MSJ Exh. 26);			
P-7	Spring 2018 emails (Reeves, Hendrix, Robinson) "cultural awareness" (AISD 464-465) (Def. MSJ Exh. 27);			
P-8	April 2018, Emails From Mrs. Parks-Sneed To Dr. Cruz (racial bullying) (Def. MSJ Exh. 28);			
P-9	April 2018, Emails from Jacob Reach Re: Meeting (Def. MSJ Exh. 29);			
P-10	April 2018, Emails To/From Robinson re: FFA conduct at banquet (Def. MSJ Exh. 30);			
P-11	April 2018 emails with Rosa Palacios (AISD Exec. Asst. to Dr. Cruz) (Sneed 133-141)			
P-12	May 2018 emails with Jacob Reach (AISD) (Sneed 206)			
P-13	May 2018 emails to Mr. Robinson (Sneed 230-231)			
P-14	May 2018 emails with Rosa Palacios, Dr. Shapiro, Mark Robinson (Sneed 327-242)			
P-15	May 2018 emails with Rosa Palacios (Sneed 286-288)			
P-16	May 23, 2018 email to Robinson/Shapiro (racism "norm") (AISD 078 – 082).			
P-17	October 2018 emails re: Yasmin Wagner (AISD Board of Trustees) (AISD 021-24)			
P-18	Sass-quatch Award (Def. MSJ Ex. 13);			
P-19	DWQ Better Path Counseling and Consulting, PLLC (treatment records) (redacted)			
P-20	DWQ Better Path Counseling and Consulting, PLLC (billing records)(redacted)			
P-21	DWQ Glasshouse Effect Psychotherapy (treatment records)(redacted)			
P-22	DWQ Glasshouse Effect Psychotherapy (billing			

EX. NO.	DESCRIPTION	O F F R E D	O B J E C T	A D M I T
	records)(redacted)			
P-23	School Board Policy FFH (REGULATION) FREEDOM FROM DISCRIMINATION, HARASSMENT AND RETALIATION (D MSJ Ex. 8, Pl. Ex. D);			
P-24	School Board Policy FFH (LEGAL); FREEDOM FROM DISCRIMINATION, HARASSMENT AND RETALIATION (Pl. Exh. B);			
P-25	School Board Policy FFH (LOCAL); FREEDOM FROM DISCRIMINATION, HARASSMENT AND RETALIATION (Pl. Exh. C);			
P-26	School Board Policy FFH (EXHIBIT); FREEDOM FROM DISCRIMINATION, HARASSMENT AND RETALIATION (Pl. Exh. E);			
P-27	<i>Dear Colleague Letter</i> , U.S. Department of Education, <i>Office of Civil Rights</i> (July 25, 2000).			
P-28	<i>Dear Colleague Letter</i> , U.S. Department of Education, <i>Office Of Civil Rights</i> (October 26, 2010);			
P-29	Clarifying Letter from US Department of Education (October 26, 2010);			
P-30	<i>Guiding Principles- A Resource Guide For Improving School Climate And Discipline</i> , U.S. Department of Education, January 2014;			
P-31	Department of Education, Racial Incidents and Harassment Against Students at Educational Institutions, 59 Fed. Reg. 11448 (1994).			
P-32	Guidelines On Bullying, Texas Association Of School Boards (2008);			
P-33	Guidelines On Bullying, Texas Association Of School Boards (2012);			
	II. PLAINTIFF MAY OFFER			
P-34	Dr. Craig Shapiro Deposition (D MSJ Ex. 6);			
P-35	Dr. Cruz Deposition (Pl. Supp., Exh. 1);			

EX. NO.	DESCRIPTION	O F F R E D	O B J E C T	A D M I T
P-36	Camryn Sneed Deposition (D MSJ Ex. 1);			
P-37	Charles Sneed Deposition (D MSJ Ex. 2);			
P-38	Pamela-Parker Sneed Deposition (D MSJ Ex. 3);			
P-39	Mark Robinson Deposition (D MSJ Ex. 4);			
P-40	Susan Leos Deposition (D MSJ Ex. 5);			
P-41	Mark Robinson, Declaration (D MSJ Ex. 7);			
P-42	Susan Leos Declaration (D MSJ Ex. 10);			
P-43	Oct. 2017 Police Report (Def. MSJ Ex. 20);			
P-44	Officer Stephanie Kirkov, Declaration (Def. MSJ Ex. 14);			
P-45	Amber Dickinson, Declaration (Def. MSJ Ex. 17);			
P-46	Shelby Stephens, Declaration (Def. MSJ Ex. 18);			
P-47	Oct. 2017 Farm Concerns (Def. MSJ Ex. 19);			
P-48	May 4, 2018, Meeting To Discuss FFA (Def. MSJ Exh. 31);			
P-49	5/22/18 Summary of Incident (De La Rosa to Robinson) (Def. MSJ Exh. 32)			
P-50	September 15, 2018 APD Report about criminal mischief on farm (Def. MSJ Exh. 35);			
P-51	Follow Up Emails on APD Report (Def. MSJ Exh. 36);			
P-52	Emails To Kylee Rhorer on farm incident (Def. MSJ Exh. 37);			
P-53	Emails re: Kylee Rhorer on farm incident (Def. MSJ Exh. 38);			
P-54	Oct. 22, 2018 emails from Officer Kirkov on farm incidents (Def. MSJ Exh. 39);			
P-55	DWQ South Austin Medical Clinic (treatment records)			
P-56	December 2016 emails with Leos/Shapiro (Sneed 9-13)			
P-57	October 2017 emails with Robinson (Sneed 56-60)			
P-58	October 2017 emails with Leos/Shapiro (Sneed 74-77)			
P-59	April 2018 emails with Traci Hendrix (AISD CTE Coordinator) (Sneed 116-120)			

EX. NO.	DESCRIPTION	O F F R E D	O B J C E T	A D M I T
P-60	May 2018 emails with Mr. Robinson (Sneed 255-258)			
P-61	10/25/17 Meeting with Mr. Robinson (Sneed 394-396)			
P-62	List of Ag problems including “racial slurs” (Sneed 401)			
P-63	(AISD 967) – Diagram of James Bowie High School			
P-64	Camron’s education file (AISD production)			
P-65	Plaintiff reserves the right to introduce any portion of documents produced in Discovery/Disclosure by the parties			
P-66	Plaintiff reserves the right to introduce other exhibits for purposes of cross examination and/or impeachment.			

Respectfully submitted,

/s/ ANTHONY O'HANLON
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CERTIFICATE OF SERVICE

I hereby certify that on October 13, 2020, I hereby certify that a true and correct copy of the above and foregoing document has been electronically served on all counsel of record.

/s/ Anthony O'Hanlon
Anthony O'Hanlon